

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF CUMBERLAND VALLEY)	
ELECTRIC, INC. FOR A CERTIFICATE OF)	
PUBLIC CONVENIENCE AND NECESSITY TO)	CASE NO.
CONSTRUCT FACILITIES ACCORDING TO)	2011-00442
THE APPLICANT'S 01/01/2012-12/31/2015)	
CONSTRUCTION WORK PLAN)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO CUMBERLAND VALLEY ELECTRIC, INC.

Cumberland Valley Electric, Inc. ("Cumberland Valley") is to file with the Commission, in the format identified in the Commission's Order entered December 2, 2011 for the use of electronic filing procedures, its Responses to the requests herein, with a copy as identified in the Commission's December 2, 2011 Order to all parties of record.

The original and paper copy filed with the Commission shall be appropriately bound, tabbed and indexed and shall include the name of the witness responsible for responding to the questions related to the information provided.

The information requested herein is due within 14 days of the date of this Request. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the

preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Cumberland Valley shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Cumberland Valley fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request.

1. Refer to paragraphs 10 and 11 of the Application and Section E of the Executive Summary in the Application. Provide a breakdown of the costs by year that reflect the exclusions contained in Section E, paragraph 11.
2. Refer to Item C.3. of the "Basis of Study and Proposed Construction." The 2010 Operations and Maintenance Survey listed two items that required corrective action. Explain what procedures have been put in place to address those problems.
3. Refer to Exhibit C of the Application. Explain why three of the projects contained in the prior Construction Work Plan were cancelled.

4. Refer to page 10 of the CWP document prepared by consultant Patterson & Dewar Engineers, Inc. Under Section I, the replacement of the CVE radio system is noted.

a. The above replacement is supported by a study "by a reputable engineering firm with experience in radio communications" Provide the study and the name of the engineering firm.

b. The statement, "[t]he many benefits of an accurate and modern AM/FM/GIS system are well documented in the industry" Provide that documentation or the sources of such.

5. Refer to Exhibit B, page 1. Explain the item "Transformers for voltage conversion on Jellico Creek Substation in Year 3." Give the voltages involved and the reasons for the change.

6. Refer to the O&M Survey completed by the Rural Utilities Service ("RUS") Field Representative where foreign structures and attachments are noted as needing attention for improvement. Explain what plans are being made to specifically address those situations.

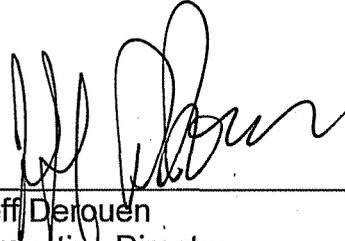
7. It was noted in Exhibit L that primary conductors are considered for replacement when loaded to 65 percent of the thermal rating. In Exhibit R, several accounts are indicated to be loaded to over 65 percent. Are these large power loads addressed the same as primary conductors and are they being considered for replacement? Explain.

8. Refer to Exhibit E, page 2, with regard to RUS Form 740c and Accounting Code 601.

- a. There is a cost detail for new meters and new replacement meters.

Describe the type of meters that Cumberland Valley Electric proposes to install in these two categories, giving the functions and capabilities of such meters in relation to existing meters being used.

- b. Are these new meters an upgrade to more advanced AMR/AMI-capable meters?



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Public Service Commission
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DATED FEB 17 2012

cc: Parties of Record

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